

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

MDL No. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

THIS DOCUMENT RELATES TO:

State of Iowa v. Abbott Laboratories., et al.

**DECLARATION IN SUPPORT OF DEFENDANTS ASTRAZENECA
PHARMACEUTICALS LP'S AND ASTRAZENECA LP'S INDIVIDUAL
REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF THEIR
MOTION TO DISMISS THE COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(6)**

I, Katherine B. Schmeckpeper, declare as follows:

1. I am an attorney with Foley Hoag LLP, counsel for Defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP (collectively, "AstraZeneca") in this action. I submit this declaration in support of AstraZeneca Pharmaceuticals LP's and AstraZeneca LP's Individual Memorandum of Law in Further Support of Their Motion to Dismiss.

2. Attached as Exhibit A is a true and correct copy of AstraZeneca's Corporate Integrity Agreement with the Office of Inspector General of the United States Department of Health and Human Services.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 18, 2008

By: /s/ Katherine B. Schmeckpeper

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on April 18, 2008, a copy to LexisNexis File & Serve for posting and notification to all parties.

/s/ Katherine B. Schmeckpeper